

ATTORNEYS AT LAW

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October 21, 2013

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RWQCB-CVR FRESNO, CALIF.

Via Electronically Only

Lonnie M. Wass Supervising Engineer California Regional Water Quality Control Board Central Valley Region 1685 E Street Fresno, CA 93706 lwass@waterboards.ca.gov

SUBJECT:

Tentative Waste Discharge Requirements for Friant Ranch, A Limited Partnership, Water Works District No. 18, SWD Investments, Inc., Friant Ranch Wastewater Treatment Facility, Fresno County (Tentative WDRs)

Dear Mr. Wass:

On behalf of Friant Ranch, L.P., and SWD Investments, Inc. (collectively, Friant Ranch), we thank you and your staff for your efforts with respect to the Tentative WDRs for the Friant Ranch Wastewater Treatment Facility. In general, Friant Ranch supports the Tentative WDRs as proposed and requests adoption by the Central Valley Regional Water Quality Control Board (Central Valley Water Board). With this letter, we are conveying non-substantive comments to request that several duplicative or conflicting provisions be deleted. As indicated, these suggested changes do not alter any of the substantive requirements but are intended to eliminate confusion that might otherwise be created with duplicative/conflicting provisions.

I. Hereby Ordered Provisions for Waterworks District No. 18

- Provision B.11 is duplicative of B.4.
- Provision G.16 is duplicative of B.13, and does not apply to SWD Investments, which is included in the text in G.16.
- Provision G.18 is duplicative of G.6.
- Provision G.19 is duplicative of G.7.
- Provision G.20 is duplicative of G.5.
- Provision G.28 is duplicative of G.8.

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II. Hereby Ordered Provisions for Friant Ranch, L.P., and SWD Investments, Inc.

- Provision B.8 is duplicative of B.1.
- Provision C.29 conflicts with C.27 and should be deleted.
- Provision C.31 is duplicative of C.23.
- Provision E.9 is duplicative of E.4.
- Provision E.10 is duplicative of E.8.
- Provision E.11 is duplicative of E.5.
- Provision E.16 is duplicative of E.6.
- Provision E.17 is duplicative of E.7.
- Provision E.18 is duplicative of E.3.

Accordingly, we respectfully request that the duplicative/conflicting provisions identified above, be deleted.

Thank you again for your efforts. Please contact Theresa Dunham if you have any questions.

Sincerely,

Theresa Dunham

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cc (via email only):

Bryan Wagner, SWD Investments, Inc. (bryan@watnerandwagner.com)

Dennis Bacopulos, Friant Ranch, L.P. (dennisbacopulos@cox.net)

Dan Pearce, Fresno County Water Works District No. 18 (danpearce@waterworksdist18.com)

Scott Hatton, Central Valley Regional Water Quality Control Board (shatton@waterboards.ca.gov)